# **Attorney General's First Set of Information Requests**

### THE BERKSHIRE GAS COMPANY D.T.E. 02-19

Witness: Karen L. Zink Date: June 7, 2002

AG-1-10 Please explain in complete detail how the dollar amounts were determined for

"participating share," "benchmark", "aggregate minimum savings" and "aggregate savings sharing level" as those terms are defined respectively in §§ 1.42, 1.6, 1.3, 1.4 of the Gas Portfolio Optimization Agreement. Include in the

explanation all assumptions, calculations, studies, reports and work papers.

**Supplemental** 

**Response:** Please refer to the Supplemental Response to Information Request AG-1-15 dated

June 7, 2002

## Attorney General's First Set of Information Requests

#### THE BERKSHIRE GAS COMPANY D.T.E. 02-19

Witness: Karen L. Zink Date: June 7, 2002

#### **AG-1-15**

Please produce copies of all documents relating to the request for proposals ("RFP") for the "Berkshire RFP" and the "Joint RFP", as those terms are defined in the Company's April 5, 2002 filing letter. Include in this response copies of all the initial request letter(s) sent to each bidder, any updates, modification or amendments to the RFPs and any responses sent by the RFP recipients. Include in this response all evaluations, studies, reports and work papers related to the RFP responses.

#### **Supplemental**

#### **Response:**

Attached please find copies of the responses to the previously provided Joint RFP. Also attached are responses to the Berkshire RFP. Please note that these responses are considered highly confidential as they include specific bid proposals as well as other competitively sensitive materials. The Company is obligated to maintain the confidentiality of these materials.

Finally, attached please find materials prepared in connection with the review of the Joint RFP, including a benchmark analysis prepared by the Energy East companies.

All attachments to this supplemental response are confidential and proprietary and are provided pursuant to the Company's April 5, 2002 Motion and the Hearing Officer's ruling and separate confidentiality agreements with the Attorney General and the DOER.

\*\* ATTACHMENTS ARE CONFIDENTIAL AND PROPRIETARY\*\*
\*\*PROTECTIVE TREATMENT\*\*